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District of Nevada
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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LESLIE R. LEONARDO
Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.

Case No. 2:18-cv-00279-CWH

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO PLAINTIFF'S
MOTION FOR**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be extended from August 15, 2018 to **August 29, 2018**. This is Defendant's second request for extension. Good cause exists to grant Defendant's request for extension. Counsel had another death in her family as well as a family medical emergency of an immediate family member. Counsel also has over 85+ pending social security cases, which require two or more dispositive motions a week until mid-September, a pending Ninth Circuit matter, and several non-litigation civil rights and representative misconduct matters that require prompt attention and investigation. Due to current workload demands and unanticipated leave,

1 Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's
2 Motion for Remand. Defendant makes this request in good faith with no intention to unduly delay the
3 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.
5

6
7 Respectfully submitted,

8 Dated: August 15, 2018

/s/ *Edward A. Wicklund
(*as authorized by email on August 15, 2018)
EDWARD A. WICKLUND
Attorney for Plaintiff

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12 Dated: August 15, 2018

DAYLE ELIESON
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

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16 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

19 **ORDER**

20 APPROVED AND SO ORDERED:

21
22 DATED: August 17, 2018



HON. CARL W. HOFFMAN
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME FOR**
4 **DEFENDANT TO RESPOND TO PLAINTIFF'S MOTION FOR REMAND** on the date and via
5 the method of service identified below:

6 **CM/ECF:**

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20 Attorneys for Plaintiff

21 Respectfully submitted this 15th day of August 2018,

22 /s/ Tina L. Naicker
23 TINA L. NAICKER
24 Special Assistant United States Attorney
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